

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

ROBERT WITT,

Plaintiff,

v.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Defendant.

No. 1:20-CV-01249

JOINT REQUEST TO MODIFY THE PROPOSED SCHEDULING ORDER

Plaintiff Robert Witt and Defendant Novartis Pharmaceuticals Corporation (“NPC”), respectfully request that the Court modify the proposed scheduling order (ECF No. 20) and enter a new scheduling order setting the following deadlines:

<u>EVENT</u>	<u>PROPOSED DATE</u>
Letter to Court re: requests for modification of initial Scheduling Order; joint request for early settlement / ADR conference; report about whether parties agree to defer any expert discovery until after summary judgement motions are resolved; report about deposition hours; initial report whether there is unanimous consent to proceed before a United States Magistrate Judge; conference about discovery of electronically stored information	September 2, 2020
Moving for joinder of additional parties and amendment of pleadings	October 5, 2020
Plaintiff’s Rule 26(a)(2) disclosures	May 24, 2021
Defendant’s Rule 26(a)(2) disclosures	June 24, 2021
Plaintiff’s rebuttal Rule 26(a)(2) disclosures	July 1, 2021
Rule 26(e)(2) supplementation of disclosures and responses	September 8, 2021

<u>EVENT</u>	<u>PROPOSED DATE</u>
Discovery deadline; submission of status report	October 4, 2021
Requests for Admission	October 8, 2021
Dispositive pretrial motions deadline	December 4, 2021

Dated: September 2, 2020

/s/Craig M. Silverman

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2020, the foregoing document was served upon counsel of record via the Court's CM/ECF system:

/s/ Robert E. Johnston

Robert E. Johnston, Bar No. 447475